

## CALFRESH (CF) PROGRAM

### REQUEST FOR POLICY/REGULATION INTERPRETATION

**INSTRUCTIONS:** Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 09-13-12	NEED RESPONSE BY:
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Fresno	
3. PHONE NO.:	7. SUBJECT: Eligibility Signatures on Application forms	
4. REGULATION CITE(S):	8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> <b>NOTE: All requests must have a regulation cite(s) and/or a reference(s).</b>  Food Stamp Application form: CFR 273.2(b) Application Process: 63-300	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

With forms being scanned/imaged into an imaging system at the point of entry, either at reception or when received at the mail room, if the imaged document has to be printed for the EW to sign and then re-imaged, it creates a redundancy and diminishes the stream lining of the business process. Currently the application form consists of three forms: DFA 285-A1, A2 and A3 and all three contain an EW signature line. The signatures have been mandated and obtained based on the nature of form and the signature lines. In review of the CFR section cited, the only signatures (possibly two) are required from the applicant only. The state regulations only reference client signature. Is the EW signature truly required on any of the forms or can documentation as recorded in the eligibility system and/or case comments/narratives suffice? The DFA 285 A2 already has a bullet where the client/applicant is certifying that they understand their rights and responsibilities and another bullet for the penalties. Wouldn't this make the A3 signatures unnecessary?

10. REQUESTOR'S PROPOSED ANSWER:

Answer 1:

Eligibility Worker signature on the application forms, including the FS 27 for recertification, are not mandated and therefore not required to be obtained, either electronically or on the application itself.

Answer 2:

Yes, it would appear that the signatures (client and worker) are redundant. The CDSS currently has an application workgroup and this will be taken into consideration at the time the application is revised.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

CDSS concurs with the county's proposed response.

#### FOR CDSS USE

DATE RECEIVED: 9/13/2012	DATE RESPONDED TO COUNTY/ALJ: 9/21/2012
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